

**FILED**

U.S. DISTRICT COURT  
EASTERN DISTRICT ARKANSAS

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF ARKANSAS  
WESTERN DIVISION

001 2 5 1997

PAULA CORBIN JONES, :  
 :  
 Plaintiff, :  
 :  
 v. :  
 :  
 WILLIAM JEFFERSON CLINTON :  
 :  
 and :  
 :  
 DANNY FERGUSON, :  
 :  
 Defendants. :

JAMES W. McCORMACK, CLERK  
By: *[Signature]*  
CIVIL ACTION DEP. CLERK  
NO. LR-C-94-290

Judge Susan Webber Wright

UNDER SEAL  
(Per Order entered 10/23/97)

**NOTICE OF MOTION TO TRANSFER AN ANCILLARY  
DISCOVERY PROCEEDING TO THIS COURT**

President Clinton, through the undersigned counsel, hereby provides notice that he has requested the United States District Court for the Eastern District of Virginia (Richmond Division) to transfer an ancillary discovery proceeding to this Court for resolution. By way of background, on July 29, 1997, plaintiff served Ms. Kathleen E. Willey with a subpoena duces tecum and a notice of deposition. Ms. Willey thereafter filed, in the Eastern District of Virginia, under seal, a Motion for Protective Order, seeking to quash the subpoena and notice of deposition. The progression of this matter was delayed by the withdrawal of Ms. Jones's original counsel of record.

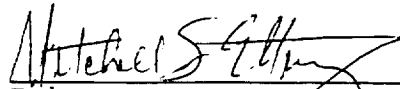
Counsel for President Clinton entered an appearance in the Eastern District of Virginia proceedings on October 13, 1997. The President supports Ms. Willey's motion to quash the subpoena on the basis that the testimony sought has no possible relevance to

this proceeding and is intended solely to embarrass and humiliate the President and his Office. He thus has asked the District Court to quash the subpoena. In the alternative, the President has requested that the matter be transferred to this Court for disposition. Ms. Willey is supportive of the request for a transfer.

As a courtesy to the Court, submitted herewith are the substantive pleadings filed to date with respect to Ms. Willey's motion for a protective order (Attachments 1-10). We believe the enclosed pleadings are relevant to broader pending issues regarding the appropriate scope of discovery in this case -- issues that shortly will be before this Court.

Respectfully submitted,

By:



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Counsel to  
President William J. Clinton

Dated: Washington, D.C.  
October 22, 1997

CERTIFICATE OF SERVICE

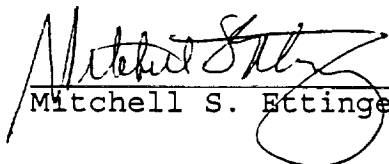
I hereby certify that on this 23<sup>rd</sup> day of October, 1997,  
a true and correct copy of the NOTICE OF MOTION TO TRANSFER AN  
ANCILLARY DISCOVERY PROCEEDING TO THIS COURT was served via  
federal express prepaid to:

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